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April 2, 2020

Hon. Loretta A. Preska
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Shulaya, et al.*
Docket No.: 17-CR-350

Dear Judge Preska:

I served as CJA counsel to Defendant Nikoloz Jikia in the above referenced case following his post-*Davis* motion to vacate his conviction pursuant to 18 U.S.C. 924(c). I was appointed on October 10, 2019. Mr. Jikia was recently sentenced by Your Honor on March 9, 2020. I write to respectfully ask the Court to appoint Chase Ruddy, Esq., as associate CJA counsel to Mr. Jikia *nunc pro tunc* to October 10, 2019.

Mr. Ruddy appeared with Mr. Jikia on my behalf on two occasions and did a significant amount of work behind-the-scenes to assist me with Mr. Jikia's case. Mr. Ruddy is an experienced attorney who has worked for my firm since September 2011. He has been admitted to practice in the Southern and Eastern Districts of New York for more than seven years and has worked on well over 100 federal criminal cases with me, including numerous CJA matters. He is responsible for much of the work that resulted in Mr. Jikia's reduced post-*Davis* sentence, and the work performed by Mr. Ruddy greatly aided Mr. Jikia (and me) while representing a cost saving measure to the Court.

Due to an oversight on my part, this request was not made at the time I was appointed. I ask that the Court grant it now so that the work performed by Mr. Ruddy may be recognized. If the Court is inclined to grant this request, I respectfully request that Mr. Ruddy be appointed at the associate rate of \$90 per hour.

I thank Your Honor for your consideration and wish everyone well.

Mr. Ruddy shall be appointed associate
CJA counsel nunc pro tunc to October 10,
2019.

Respectfully submitted,

/s/ Edward V. Sapone

Edward V. Sapone

Loretta A. Preska 4/3/2020